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February 27, 2008

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: CPNI Certification and Accompanying Statement  
EB Docket No. 06-36**

Dear Ms. Dortch:

Advanced Communications Technology, Inc., by its attorneys and pursuant to Section 64.2009(e) of the Commission's Rules, hereby submits its CPNI certification and accompanying statement.

Should you have any questions or need further information, please contact the undersigned.

Sincerely,

/s/

Marjorie Spivak

cc: Telecommunications Consumers Division, Enforcement Bureau  
Best Copy and Printing, Inc.

Attachments



**Advanced Communications Technology**

290 N. Brooks • Box 7039 Sheridan, WY 82801  
307.673.0910 Fax 307.673.0911 Email: act@actaccess.net

**CERTIFICATION OF CPNI FILING  
[Section 64.2009(e) of FCC Rules]**

**EB-06-TC-060  
EB DOCKET NO. 06-36**

I hereby certify that I am an Officer of Advanced Communications Technology, Inc.

I have personal knowledge that the Company and its affiliates established operating procedures that are designed to ensure compliance with the Customer Proprietary Network Information rules and requirements in Subpart U of Part 64 of the Federal Communications Commission's Rules (47 C.F.R. §§64.2001 through 64.2009). The attached Statement of CPNI Compliance explains how the Company's operating procedures ensure that it is in compliance with the foregoing FCC rules.

I am making this certification for the year 2007.

Tim P. Green  
Signature

Tim P. Green  
Printed Name

Vice President/General Manager  
Office Held

February 27, 2008  
Date



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### **ATTACHMENT**

#### **CPNI Policy Statement**

Pursuant to Section 64.2009(e) of the Federal Communications Commission's ("FCC") rules, this statement explains how Advanced Communications Technology, Inc.'s operating procedures ensure compliance with Part 64, Subpart U of the FCC's rules.

Advanced Communications Technology, Inc. has chosen to prohibit the use of CPNI for marketing purposes.

Advanced Communications Technology, Inc. CPNI Policy Manual includes an explanation of what CPNI is and when it may be used without customer approval.

Employees with access to CPNI have been trained as to when they are and are not authorized to use CPNI. Advanced Communications Technology, Inc. CPNI Policy Manual describes the disciplinary process related to noncompliance with CPNI obligations, and sets forth the penalties for non-compliance, which can include termination of employment.

Advanced Communications Technology, Inc. has established a supervisory review process regarding Advanced Communications Technology, Inc. compliance with the FCC's CPNI rules.

Advanced Communications Technology, Inc. requires affirmative written subscriber approval for the release of CPNI to third parties.

A CPNI Compliance Officer has been appointed for Advanced Communications Technology, Inc. and a Corporate Officer is held responsible for annually certifying that Advanced Communications Technology, Inc. is in compliance with the FCC's CPNI rules and submitting the certification and Advanced Communications Technology, Inc. statement explaining how Advanced Communications Technology, Inc. complies with the FCC's CPNI rules to the FCC prior to March 1.

#### **Advanced Communications Technology, Inc. Safeguards**

Advanced Communications Technology, Inc. takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. The Advanced Communications Technology, Inc. has safeguards in place to protect against unauthorized access to CPNI. The Advanced Communications Technology, Inc. authenticates a customer prior to disclosing CPNI based on customer initiated telephone contact or an in-store visit.



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Advanced Communications Technology, Inc. only discloses call detail information over the telephone, based on customer-initiated telephone contact, if the customer first provides a password that is not prompted by the carrier asking for readily available biographical information or account information. If a customer does not provide a password, Advanced Communications Technology, Inc. only discloses call detail information by sending it to an address of record or by calling the customer at the telephone number of record. If the customer is able to provide call detail information during a customer-initiated call without Advanced Communications Technology, Inc.'s assistance, then Advanced Communications Technology, Inc. is permitted to discuss the call detail information provided by the customer.

Advanced Communications Technology, Inc. has established a system of passwords and password protection. For a new customer (a customer that establishes service after the effective date of the new CPNI rules), Advanced Communications Technology, Inc. requests that the customer establish a password at the time of service initiation. For existing customers to establish a password, Advanced Communications Technology, Inc. must first authenticate the customer without the use of readily available biographical information or account information. Advanced Communications Technology, Inc. authenticates a customer using non-public information such as calling the customer at the telephone number of record or using a Personal Identification Number (PIN) method to authenticate a customer.

For accounts that are password protected, Advanced Communications Technology, Inc. cannot obtain the password by asking for readily available biographical information or account information to prompt the customer for his password. If a password is forgotten or lost, Advanced Communications Technology, Inc. uses a back-up customer authentication method that is not based on readily available biographical information or account information.

If a customer does not want to establish a password, the customer may still access call detail based on a customer-initiated telephone call, by asking Advanced Communications Technology, Inc. to send the call detail information to an address of record or by the carrier calling the telephone number of record.

Advanced Communications Technology, Inc. provides customers with access to CPNI at a carrier's retail location if the customer presents a valid photo ID and the valid photo ID matches the name on the account.

Advanced Communications Technology, Inc. has procedures and policies in place to notify a customer immediately when a password, customer response to a back-up means of authentication for lost or forgotten passwords, or address of record is created or changed.

A Subsidiary of Range Telephone Cooperative



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In the event of a CPNI breach, Advanced Communications Technology, Inc. complies with the FCC's rules regarding notice to law enforcement and customers. Advanced Communications Technology, Inc. maintains records of any discovered breaches and notifications to the United States Secret Service (USSS) and the FBI regarding those breaches, as well as the USSS and the FBI responses to the notifications for a period of at least two year.

### **Actions Taken Against Data Brokers and Customer Complaints**

Advanced Communications Technology, Inc. has taken no actions against data brokers in the last year. Advanced Communications Technology, Inc. has received no customer complaints in the past year concerning the unauthorized release of CPNI.